

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☐ Record 1 of 1  
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Submission Type: CO ☐ Submission Status: ACCEPTED ☐ Viewing Status: UNRESTRICTED ☐  
Subject:  
Docket Number: Exparte Late Filed: File Number:  
Calendar Date Filed: 08/30/1998 7:38:57 PM Date Disseminated: Filed From: INTERNET  
Official Date Filed: 08/31/1998 Date Released/Denied: Initials:  
Confirmation #: 1998830720296 Date Filed:

**RECEIVED**

**AUG 31 1998**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**INTERNET FILING**

98 - 143

8/31/98

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**Before the  
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Washington, D.C. 20554**

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**Comments**

I write this in concern of some of the proposed rule making that you are suggesting. I will outline each point below:

***FCC Proposal:*** Reducing the number of licenses by eliminating the NOVICE and TECHNICIAN PLUS.

***My Comment:*** Reducing the number licenses is a good idea, however, not at the expense of the two licenses. As stated in a letter you received from the ARRL, NOVICE license holders should be allowed to take the written test of element 3(A) and 3(B) within one year after the

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are changed and given GENERAL operator privileges. As for the TECHNICIAN PLUS license, they should be allowed to take the element 3(B) test and upgrade to the GENERAL license in the

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***My Reason:*** Giving a specific license holder GENERAL privileges because they

received their license before a specific date (IE: March 21, 1987) because of the test element (3B) is unfair. If this is allowed, many amateurs would no longer find interest as they would be required to give up their license because of the stringent requirements

to upgrade.

Both of these license holders have experience in the HF band. Not giving them the chance to upgrade would cause disappointment. It would be a disservice if these TECHNICIAN PLUS licenses are allowed to upgrade just because they have taken element 3(B). Performing these license upgrades allows those licenses to leave the FCC database through attrition, removing the need to keep such license in the database and reducing paperwork. If they don't

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their license within a year, both license would become

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***FCC Proposal:*** Greater volunteer examiner opportunities.

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**FCC Proposal:** RACES Station license.

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**My Comment:** Enforcement of compliance is in need of volunteers. Providing some type of training in handling and monitoring of the bands for enforcement would allow volunteers to be able properly handled any infraction of the bands. Volunteers need to have a license for at least 10 years and a GENERAL class license or higher would be required. Volunteers must log about 50 hrs of monitoring. This would provide a simple and easy solution that would keep the FCC's costs down.

**FCC Proposal:** Telegraphy Examination Requirements

**My Comment:** Use of morse code is still useful in low power situations. However, the need to keep morse code as a test requirement is not fully needed. Since data communication can send data faster than a CW operator, morse code becomes just another mode. Though some type of testing is need to comply with international regulation, the speed of how it's received needs to be reduced. I believe the 5-10-15 WPM approach is adequate with this requirement. I also believe that just receiving the code is adequate for testing purposes. Sending the code during testing would just add to another item to be waived because of physical handicap.

**My Reason:** Technical knowledge is needed in this forum, not a skill. The only reason I support this MODE, is because of internation regulations. If that regulation is removed, then I would support complete removal of the code requirement. This forum should be working on getting more technically inclined people, rather than filtering out people through use of a mechanical SKILL. Since we don't test for other MODES, why make this hard. Older operators with GENERAL or higher

class of license are more against any changes to the requirement. I believe that the need to improve the written testing requirements are needed rather than keep testing a MODE that is outdated. Most licenses are using computers to send code rather than having them sit and pound on a hand keyer. So why do we keep this requirement?

The higher class license always say to me, 'I did it and so should you'.

But those same people can't get their computers to run right. So should we test them on Computer Operations also, no. We need operators who can choose what they want to do. Let's not limit them because they can't perform a skill.

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***My Comment:*** To really test an individual on their knowledge of the rules and electronic theory, The testing pool should be used as a guideline on how the questions to be presented. *Example:* Have an Ohm's law question not set to a specific set of numbers, Have the question were the examiner can enter their own numbers into the problem and provide multiple choices for the answers with only one right answer. Another example, for a Regulation question, would be a question that required a person to know what section in Part 97 covers 'malicious interference'. Then they would have to pick the proper answer from a multiple choice answer. This answer wouldn't be to indepth, as it could be answered with 97.101. This would also allow flexibility in preparing the test as 97.101 covers other items like 'priority to emergencies' or 'non-exclusive use of a frequency'.

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